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UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

KELLY WILSON, an individual,

 Plaintiff,

vs.

THE WALT DISNEY COMPANY, a Delaware corporation; DISNEY ENTERPRISES, INC., a Delaware corporation; WALT DISNEY PICTURES, a California corporation; WALT DISNEY MOTION PICTURES GROUP, INC., a California corporation; and DOES 1 through 25, inclusive,

Defendants.

Case No. 3:14-cv-01441-VC

AMENDED DECLARATION OF J. PAUL GIGNAC IN SUPPORT OF PLAINTIFF'S ADMINISTRATIVE MOTION TO FILE UNDER SEAL EXHIBITS TO DECLARATION OF MISCHA N. BARTEAU IN SUPPORT OF PLAINTIFF'S MOTION FOR PARTIAL SUMMARY JUDGMENT

Judge: Hon. Vince G. Chhabria
 Date: April 9, 2015
 Time: 10:00 a.m.
 Ctrm: 4

AMENDED DECLARATION OF J. PAUL GIGNAC

I, J. Paul Gignac, declare under penalty of perjury, pursuant to 28 U.S.C. § 1746, as follows:

1. I have personal knowledge of the matters stated herein. If called as a witness, I could and would testify truthfully and competently thereto under oath.

2. I have been admitted and licensed to practice before all of the courts of the State of California since 1986. I have at all times since then been a member in good standing of the California State Bar. I have been admitted to and have practiced before the United States District Court for the Northern District of California since 1987.

3. I am a partner with the law firm of Arias Ozzello & Gignac LLP, one of the law firms representing plaintiff Kelly Wilson ("Plaintiff") in this action.


4. I submit this declaration in support of Plaintiff's Amended Administrative Motion to File Under Seal Exhibits to Declaration of Mischa N. Barteau in Support of Plaintiff's Motion for Partial Summary Judgment, as required by Local Rule 79-5(e).

5. I submit this Amended Administrative Motion to File Under Seal because Defendants' counsel contacted me on March 13, 2015 and indicated that, upon further review, Defendants are only seeking to maintain confidentiality as to the following documents, or portions thereof, filed as exhibits to the Declaration of Mischa N. Barteau in Support of Plaintiff's Motion for Partial Summary Judgment: Exhibits 2-3, 7-12, 31-32, 62, 64 and 67.

6. The unredacted version of the Memorandum of Points and Authorities in Support of Plaintiff's Motion for Partial Summary Judgment refers to information or documents designated by Defendants as either "confidential" or "highly confidential/attorneys' eyes only."

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 13th day of March 2015, at Santa Barbara, California.


J. Paul Gignac